

1 Lisa Barnett Sween (SBN 191155)  
2 Amelia Sanchez-Moran (SBN 281219)  
3 JACKSON LEWIS P.C.  
4 50 California Street, 9th Floor  
5 San Francisco, CA 94111-4615  
6 Telephone 415.394.9400  
7 Facsimile 415.394.9401  
8 Email: [lisa.sween@jacksonlewis.com](mailto:lisa.sween@jacksonlewis.com)  
[amelia.sanchez-moran@jacksonlewis.com](mailto:amelia.sanchez-moran@jacksonlewis.com)

9 Attorneys for Defendant  
10 THE ROMAN CATHOLIC ARCHBISHOP  
11 OF SAN FRANCISCO, A Corporation Sole  
12 (erroneously sued as the ARCHDIOCESE OF  
13 SAN FRANCISCO)

14 Paul E. Gaspari, (SBN 76496)  
15 Daniel C. Zamora (SBN 224375)  
16 WEINTRAUB TOBIN CHEDIAK  
17 COLEMAN GRODIN law corporation  
18 475 Sansome Street, Suite 1800  
19 San Francisco, CA 94111  
20 Telephone 415.433.1400  
21 Facsimile 415.433.3883  
22 Email: [pgaspari@weintraub.com](mailto:pgaspari@weintraub.com)  
[dzamora@weintraub.com](mailto:dzamora@weintraub.com)

23 Attorneys for Defendant  
24 FATHER BRUCE LERY

25 DENNIS J. HERRERA, State Bar #139669  
26 City Attorney  
27 YVONNE MERÉ, State Bar #173180  
28 Chief of Complex and Affirmative Litigation  
KENNETH M. WALCZAK, State Bar #247389  
Deputy City Attorney  
Fox Plaza, 1390 Market Street, Sixth Floor  
San Francisco, California 94102-5408  
Telephone: (415) 554-4244  
Email: [kenneth.walczak@sfcityatty.org](mailto:kenneth.walczak@sfcityatty.org)

29 Attorneys for Defendant/Third-Party  
30 Plaintiff/Cross-Claimant/Counter-Defendant  
31 CITY AND COUNTY OF SAN FRANCISCO

32 David M. Poore (SBN 192541)  
33 Scott A. Brown (SBN 177099)  
34 BROWN POORE LLP  
35 1350 Treat Boulevard, Suite 420  
36 Walnut Creek, CA 94597  
37 Telephone: 925.943.1166  
38 Facsimile: 925.955.8600  
39 Email: [dpoore@bplegal.group.com](mailto:dpoore@bplegal.group.com)

40 Attorneys for Plaintiff  
41 KATHERINE SAVIN

42 Michael A. Laurenson (SBN 190023)  
43 Sara A. Moore (SBN 294255)  
44 GORDON & REES  
45 SCULLY MANSUKHANI LLP  
46 275 Battery St., Suite 2000  
47 San Francisco, CA 94111  
48 Telephone 415.986.5900  
49 Facsimile 415.986.8054  
50 Email: [mlaurenson@gordonrees.com](mailto:mlaurenson@gordonrees.com)  
[smoore@gordonrees.com](mailto:smoore@gordonrees.com)

51 Attorneys for Cross-Defendant  
52 REGENTS OF THE UNIVERSITY OF  
53 CALIFORNIA

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

KATHERINE SAVIN,  
Plaintiff  
v.

CITY AND COUNTY OF SAN FRANCISCO; ARCHDIOCESE OF SAN FRANCISCO; FATHER BRUCE LERY; HEATHER HARRIS, M.D.; ANNE KINDERMAN, M.D.; and DOES 1 through 10, inclusive.

## Defendants.

## AND RELATED CROSS-COMPLAINTS

Plaintiff KATHERINE SAVIN (“Plaintiff”) and Defendants CITY AND COUNTY OF SAN FRANCISCO (the “City”), THE ROMAN CATHOLIC ARCHBISHOP OF SAN FRANCISCO, A Corporation Sole (erroneously sued as the ARCHDIOCESE OF SAN FRANCISCO) (“ASF”), FATHER BRUCE LERY, and Cross-Defendant REGENTS OF THE UNIVERSITY OF CALIFORNIA (“Regents”) (together, “the parties”) by and through their counsel of record, jointly enter into the following stipulation:

Plaintiff has reached agreements to settle her claims against the Regents, ASF, and the City (contingent on approval by the City's Board of Supervisors).

## STIPULATION AND PROPOSED ORDER

1 Defendants Regents and ASF have filed motions for good faith determination of settlement,  
2 which are pending before this Court. The City will file its motion for good faith settlement no later  
3 than Monday, May 21, 2018 (collectively, the “Motions”). The purpose of the Motions is to  
4 extinguish all counterclaims, cross-claims, and third-party claims involving the settling parties  
5 exclusively.

6 The parties stipulate and agree that holding one hearing date on the motions would be fair  
7 and expeditious.

8 THEREFORE, the parties hereby stipulate that good cause exists to set the hearing on the  
9 Motions on June 14, 2018, at 2:00 pm, with any opposition due no later than May 29, 2018. The  
10 parties agree to have the Motions heard on shortened time, and without the need for reply briefs.  
11 The parties agree that the Court may hear the motions without the need for oral argument,  
12 particularly if no oppositions are filed.

13 The parties are not making this request for the purposes of delay, and no party would suffer  
14 any prejudice if this stipulation were granted. Indeed, the parties believe that judicial economy can  
15 best be served by ensuring that the Motions are heard at one time.

16 IT IS SO STIPULATED.

17 Dated: May 21, 2018

JACKSON LEWIS P.C.

18 By: /s/ Amelia Sanchez-Moran  
19 Lisa Barnett Sween  
20 Amelia Sanchez-Moran  
21 Attorneys for Defendant  
22 THE ROMAN CATHOLIC ARCHBISHOP OF  
23 SAN FRANCISCO, a corporation sole (erroneously  
24 sued as the ARCHDIOCESE OF SAN  
25 FRANCISCO)

26 By: /s/ David M. Poore  
27 David M. Poore  
28 Scott A. Brown  
Attorneys for Plaintiff  
KATHERINE SAVIN

29 By: /s/ Paul E. Gaspari  
30 Paul E. Gaspari  
31 Daniel C. Zamora  
32 Attorneys for Defendant  
33 FATHER BRUCE LERY

DENNIS J. HERRERA  
City Attorney  
KENNETH M. WALCZAK  
Deputy City Attorney

By: /s// Kenneth M. Walczak  
Kenneth M. Walczak  
Attorneys for  
CITY AND COUNTY OF SAN FRANCISCO

By: /s/ Michael A. Laurenson  
Michael A. Laurenson  
Attorneys for Cross Defendant  
REGENTS OF THE UNIVERSITY OF  
CALIFORNIA

**CIVIL LOCAL RULE 5-1(i)(3) ATTESTATION**

I hereby attest that concurrence in the filing of this document has been obtained from each of the other signatories to this document.

DATED: May 21, 2018

By: /s/*David M. Poore*  
DAVID M. POORE  
Attorney for Plaintiff

~~PROPOSED~~ ORDER

GOOD CAUSE SHOWING, the Stipulation is GRANTED.

IT IS HEREBY ORDERED that the hearing on the motions for good faith determination of settlement shall be set on June 14, 2018, and any opposition shall be due no later than May 29, 2018. It is further ORDERED that these motions can be heard on shortened time, and without the necessity of a hearing.

SO ORDERED.

Dated: May 22, 2018

John. Tijer

UNITED STATES DISTRICT COURT